

From: (b) (6)
Sent: Tuesday, September 06, 2016 1:53 PM
To: HarborComments
Subject: Portland Harbor comments
Attachments: Reply to EPA.rtf

Good Day,

Attached are my comments regarding the planned cleanup of the Portland Harbor. My comments are filtered through a lens that includes three decades living in Portland, completing a PhD in Environmental Science, and employment as a contaminant cleanup consultant and as a Hazardous Materials Specialist.

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REPLY TO
EPA SUPERFUND PROPOSED PLAN FOR
PORTLAND HARBOR

Summary: This section may be the only one read by many commenters. It would be useful to have a summary or abstract at the beginning of the Proposed Plan. I did not see one. Many people will read only the summary provided in EPA's Portland Harbor web page and make comments based on that. These comments are based on the content of the Portland Harbor Superfund Site Proposed Plan dated June 2016.

Upland cleanup: It seems reasonable that the upland contributors to river contamination should be cleaned up prior to actual river cleanup. Sadly, since DEQ is the lead agency on upland source cleanup, I don't expect that to happen any time soon. The DEQ is chronically underfunded, understaffed, and not empowered to make industry complete cleanups in a timely matter.

Fish Consumption: I feel saddened that people who have been fishing the lower Willamette River for centuries can't do subsistence fishing there without risking their health. The Plan states that "Despite the fish advisories, the lower Willamette River is an important subsistence fishery for Tribes and many minority communities in the region." Since there continue to be communities that use the river for subsistence fishing, the river should be cleaned up to the point where eating the resident fish regularly is not unhealthy.

Monitored Natural Recovery (MNR): The proposed plan includes a 23 year period for monitored natural recovery. I hope there will be a backup plan to do some additional cleanup if significant improvement is not made. The Plan states that PCBs were banned in the late 1970s, yet they persist in the river over 40 years later. They are listed as a primary COC, and will likely require some treatment that can not be accomplished through natural recovery. MNR is really a cop-out that leaves a known environmental issue to be addressed in the future.

Known contaminated riverbanks: The proposed plan shows that there are many existing areas of known riverbank contamination with no planned action for those areas. Presumably these areas will be monitored for natural recovery. Active cleanup should be completed anywhere that the potential for subsistence fishing exists.

Flooding: The proposed plan says the Willamette River floods an average of every twenty years. It seems ridiculous to build a confinement area next to the river knowing that a flood will come by to do its damage.

Earthquake: The Cleanup Plan makes no mention of the fact that a subduction zone earthquake will occur and effects to the Portland area will be great. We don't know the timing of this event, so any cleanup should address the issue. This region will have plenty of issues to deal with after the quake, we don't need need to worry about recontamination of the river with sludge from a confined disposal facility. Any upland disposal site chosen should also be protected from remobilization of the sludge during an earthquake.

Overall: The proposed plan does not properly address cleanup of the lower Willamette

River. The proposed cleanup will be completed only to a point where the health of many users will still be impacted. It would have been a much greater plan to adopt Alternative G if EPA were actually concerned for the citizens who use the river. Instead, the EPA thought it wise to adopt an alternative of their own making and choosing.